

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

K.R.,

Plaintiff,

and

ANTHEM BLUE CROSS AND BLUE SHIELD
MEDICAID, WISCONSIN DEPARTMENT OF
HEALTH SERVICES,

Case No. 2:21-CV-00118

Involuntary Plaintiffs,

v.

MATTHEW R. BAUMHARDT, and CITY OF
BURLINGTON,

Defendants.

**PLAINTIFF K.R.'S EXPERT DISCLOSURES
PURSUANT TO FED. R. CIV. P. RULE 26(a)(2)**

NOW COMES the above-named plaintiff, K.R., by her attorneys, Cannon & Dunphy, S.C., as and for her preliminary disclosures pursuant to Fed. R. Civ. P. Rule 26(a)(2), discloses the following expert witnesses:

GENERAL STATEMENT

In light of the fact that there is currently no protective order on file in the case, the plaintiff will only be filing with this Court any and all exhibits that do not contain sensitive and protected health information. All exhibits will, however, be provided to defense counsel.

A. RETAINED EXPERT WITNESSES

1. Dr. Kate Walsh
University of Wisconsin Department of Psychology
Psychology Building, Brogden
1202 West Johnson Street, Room 324
Madison, WI 53706

Dr. Walsh has been retained to offer expert testimony by the plaintiff's counsel and is expected to testify consistent with the information contained in the report she has prepared, which is attached as **EXHIBIT 1**. Dr. Walsh reserves the right to use as trial exhibits all documents, depositions, and deposition exhibits referenced in her report as well as any additional information that becomes available during discovery from the date of her report to trial. Dr. Walsh's curriculum vitae is attached as **EXHIBIT 2**, and her fee schedule is contained in **EXHIBIT 3**. Dr. Walsh has never previously testified, and therefore no list of testimony is being provided.

B. OTHER EXPERT WITNESSES

2. Lisa Eimers, LPC
Eimers Counseling, LLC
275 4th Street East, Suite 350F
Saint Paul, MN 55101

Counselor Eimers is a licensed professional counselor who provided treatment to the plaintiff before and after the incident that is the subject of this lawsuit. She has not been retained generally or specifically to provide expert testimony in this matter, but may be called to testify concerning her history with the plaintiff, her clinical impressions as to the plaintiff, and her view of the emotional and psychological effects the incident that is the subject of this lawsuit have had on the plaintiff. A summary of her opinions is contained in a September 23, 2019 report she placed in her medical records, and a copy of the report is attached as **EXHIBIT 4**.

3. Mark Anderson, Police Chief
City of Burlington Police Department
224 E. Jefferson Street
Burlington, WI 53105

Police Chief Anderson is expected to testify on the subject matters covered at his deposition and consistent with the testimony he provided. His deposition was taken on August 18, 2021.

4. Any other health care providers, including physicians or physical therapists, identified in the plaintiff's medical records relating to the medical care and treatment the plaintiff has received for her injuries resulting from the subject incident.
5. Any other healthcare provider previously disclosed in plaintiff's answers to interrogatories and her Rule 26(a)(1) initial disclosures, who treated the plaintiff either before or after the subject incident.
6. The plaintiff intends to use documents or other demonstrative evidence produced in discovery or identified as exhibits prior to the time of trial. Discovery is continuing and the plaintiff reserves the right to supplement this disclosure in a timely fashion. The plaintiff will submit final exhibit lists 90 days before trial.
7. Any other healthcare provider who provided care or treatment to the plaintiff, as disclosed in the plaintiff's responses to defendants' first set of written interrogatories.
8. Any other experts identified by any other party in this action.
9. Any other experts identified in further discovery.
10. The plaintiff retains the right to name other retained expert witnesses as is necessary for rebuttal.

C. SPECIAL DAMAGES

A summary of past and future health care expenses related to K.R. in the amount of \$30,356.50 is attached hereto as **EXHIBIT 5**. The plaintiff reserves the right to amend this itemization in light of ongoing treatment.

Dated: October 28, 2021

CANNON & DUNPHY, S.C.
Attorneys for Plaintiff K.R.

By: /s/ Edward E. Robinson
Edward E. Robinson
State Bar No.: 01025122
Michael J. Cerjak
State Bar No.: 01056777

P.O. Address:

595 North Barker Road

P. O. Box 1750

Brookfield, WI 53008-1750

(262) 782-2700

erobinson@c-dlaw.com

mcerjak@c-dlaw.com